

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No.: 18-24450-cmb
Lora J. Kalwarski, : Chapter 13
Debtor :
: Re: Claim 2
Wells Fargo Home Equity Trust :
Mortgage Pass-Through :
Certificates, as serviced by :
Specialized Loan Servicing, :
Vs. :
Lora J. Kalwarski and :
Ronda J. Winnecour, :
Chapter 13 Trustee :
Respondents :

OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE

AND NOW COMES the Debtor, Lora J. Kalwarski, by her counsel, Shawn N. Wright, Esquire, to state the following in response to the Notice of Mortgage Payment Change filed by Wells Fargo Home Equity Trust Mortgage Pass-Through et al:

1. Debtor filed this case as a voluntary Chapter 13 bankruptcy on November 14, 2018.
2. The Notice of Mortgage Payment Change dated filed by Movant 12/1/2022 states that the new amount is \$1,038.70 effective December 1, 2022.
3. The current amount on the subject mortgage loan is \$809.31 based upon the mortgage modification amount approved by this Honorable Court.
4. The Notice of Mortgage Payment Change does not reflect the new Principal & Interest amount of \$416.96 which is

a fixed rate for the remaining of the loan. The Notice states that the Principal & Interest amount is \$623.87.

5. Debtor does not necessarily object to the escrow component, because she understands that the escrow amount may have undergone an adjustment.

WHEREFORE, Debtor objects to this Notice of Mortgage Payment Change and asks that this Honorable Court deny and strike the Notice of Mortgage Payment Change.

Attorney for Debtor

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